

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

NOV 21 2018

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY MJ, DEPUTY

MARK ALLEN PETERS,,)
Petitioner,)
v.)
OKLAHOMA DEPARTMENT OF)
CORRECTIONS, et al.,)
Defendants)
CASE NO: CIV-18-0144-G

MOTION FOR SHOWING OF GOOD CAUSE TO NOT DISMISS

Petitioner, COMES NOW filing PRO-SE proceeding in *forma pauperis* asks this Honorable court to NOT dismiss Defendants Christina Thomas, Shirley Stouffer, Ms. Parks, and Ms. Gary who were employed by Correct Care Solutions for they were in direct cause for Plaintiff not receiving proper treatment and refusing Plaintiff Medical care while He was at Lawton Correctional Facility. Plaintiff has no way to obtain their addresses therefore Correct Care Solutions should provide and/or hold responsibility for their actions.

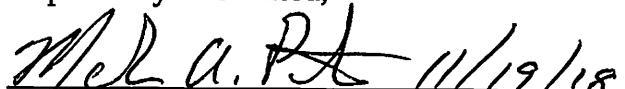
1. The Defendant's Attorney of record for Correct Care Solutions Mr. Austin J. Young OBA #32684 has not provided Petitioner with the proper address in the proper time frame, [A]nd Ms. Cotton who is employed by Correct Care Solutions did sign for and accept the summons and the complaint on 7/12/18 according to the process receipt from the U.S. Marshals Office, therefore these Defendants and/or Correct Care Solutions should provide and/or hold responsibility for their actions.
2. Medical has falsified Medical records stating Petitioner is getting treatment for His back, but they have done nothing but, an X-ray and to give Him Flexeril and Tylenol 3s, of which Dr. loper has now stopped Petitioners Tylenol 3s when still Mr. Peters is and has been waiting for an MRI and/or to be seen by a specialist and stays in severe pain. The code blue that was called on 1/9/17 when Petitioner injured His Back and the fact that a video was taken of the incident on 1/9/17, showing that no exam was done on Petitioner has been left out of the States and Lawton Correctional Facility's special reports. Ex #5 shows that Petitioner was taken off medications that was helping Him. Ex #7 Petitioner never said medications were working. There has never been any medication education given to Petitioner and that Petitioner was refused Medical treatment when Petitioner filed an Emergency Medical request on 1/10/17, and again on 1/11/17 by Ms. Parks and Ms. Gary therefore these Defendants should Not be

dismissed and/or Correct Care Solutions should provide and/or hold responsibility for their actions. .

3. The Defendant Correct Care Solutions was served with a copy of the summons and complaint and the order from the court as it appears from the proof of service on file. Ms. Erika Cotton did sign for and accept the summons and complaint and the order at the address that was provided to the Petitioner per RTS Ex #4 dated 6/21/17. If Ms Cotton was not a registered agent then why did she not send the U.S. Marshal to the correct address and/or provide correct addressed for these Defendants since this was the only addresses that was given to the Petitioner. Mr. Austin Young OBA # 32684 must have been given a copy of the complaint for Mr. Young to file Defendants motion to dismiss and to file a motion to dismiss for Ms Tocknell, Ms. Holmburg and Ms. Savoy that was filed on 8/27/18 CV-2017-658-M which should have been filed under same case # CIV-18-0144-G.
4. GEO and DOC's special report is leaving out pertinent information out of their reports. Grievance # 18-166 dated 4/6/2018 showing that a change in the dispensing of Medication was made, which shows there was a flaw in the way Medication had been getting passed out to the Inmates by Correct Care Solutions Nursing staff at Lawton Correctional Facility. C/O Clark who was running the video camera on 1/9/17 and the fact that a video tape was taken of the incident on 1/9/17 when Petitioner injured His Back is being held at GEO headquarters.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the forgoing is true and correct.

Respectfully Submitted,



Mark Allen Peters
L.C.F. #580565 / 3-D-106
8607 SE Flower Mound Rd
Lawton, OK 73501